

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SHELLYNE RODRIGUEZ, ALEXANDER NICULESCU,  
AND DANIEL MAIURI

**STIPULATION AND  
ORDER OF DISMISSAL**

Plaintiffs,

21 Civ. 10815 (PKC)

-against-

THE CITY OF NEW YORK; NEW YORK CITY MAYOR BILL  
DE BLASIO; NEW YORK POLICE DEPARTMENT (“NYPD”)  
COMMISSIONER DERMOT SHEA; NYPD CHIEF OF  
DEPARTMENT TERENCE MONAHAN; NYPD ASSISTANT  
CHIEF KENNETH LEHR; NYPD LEGAL BUREAU SERGEANT  
KENNETH RICE; NYPD OFFICER KHALID KHACHFE; NYPD  
OFFICER FIRST NAME UNKNOWN (“FNU”) DORCH; NYPD  
OFFICER RAUL FLORES; NYPD DETECTIVE NELSON NIN;  
AND NYPD MEMBERS JOHN AND JANE DOES #1-94,

Defendants

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**WHEREAS**, the parties have reached a settlement agreement and now desire to  
resolve the remaining issues raised in this litigation, without further proceedings and without  
admitting any fault or liability;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by  
and between the undersigned, that

1. The above-referenced action is hereby dismissed with prejudice as to plaintiffs  
Maiuri and Niculescu; and

2. Notwithstanding the dismissal of this action as to plaintiffs Maiuri and Niculescu in accordance with this agreement, the District Court shall continue to retain jurisdiction over this action for the purpose of enforcing the terms of the settlement agreement reached between the parties and set forth in the Stipulation of Settlement executed by the parties in this matter.

Dated: New York, New York  
October 27, 2023

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By:   
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*Attorney for Plaintiffs*

HON. SYLVIA O. HINDS-RADIX  
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City of New York  
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New York, New York 10007

By:   
Peter J. Scutero  
*Senior Counsel*

SO ORDERED:

  
HON. HON ~~PAUL~~ K. CASTEL  
UNITED STATES DISTRICT JUDGE

Dated: Oct 31, 2023